

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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AMYIAH COHOON, a minor, by and through her parents  
and legal guardians, RICHARD COHOON and ANGELA  
COHOON

Plaintiff,

v.

Case No. 20-CV-620

JOSEPH KONRATH, in his personal and official capacity  
as Sheriff of Marquette County, Wisconsin; and

CAMERON KLUMP, in his personal and official capacity  
as Patrol Sergeant for the Marquette County Sheriff's  
Office,

Defendant.

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**PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION**

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Plaintiff hereby moves for a preliminary injunction under F.R.C.P. 65 enjoining Defendants from citing Amyiah Cohoon or her parents for disorderly conduct, arresting them, jailing them, or threatening any of the above, for future posts on social media about Amyiah's scare with COVID-19. The grounds for this motion are set forth briefly below and more fully in the accompanying Declarations and Memorandum in Support of Motion for a Preliminary Injunction:

1. Amyiah posted on social media about her personal fight with what doctors told her was likely COVID-19.
2. A few days later, Defendant Sergeant Cameron Klump arrived at the Cohoons' home at the direction of Defendant Sheriff Joseph Konrath and threatened Amyiah and her parents

with citation, arrest, and jail if the post was not immediately removed. Based upon these threats, Amyiah is afraid to post further on social media about her experience.

3. Defendants' actions have deprived Amyiah of her rights guaranteed by the First Amendment. Amyiah seeks this preliminary injunction to protect her rights and to allow her to engage in constitutionally protected free expression without fear that law enforcement will take action against her or her parents for doing so.

This Motion is supported by the accompanying Brief in Support of Plaintiffs' Motion for a Preliminary Injunction and the Declarations of Amyiah Cohoon, Angela Cohoon, and Rick Cohoon. All of these documents are being filed contemporaneously with the instant Motion.

Dated: April 16, 2020

Respectfully submitted,

WISCONSIN INSTITUTE FOR LAW & LIBERTY

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*Attorneys for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2020, I sent the forgoing motion for a temporary injunction, along with the supporting memorandum and declarations, to counsel for Defendants, who agreed in writing to accept electronic service of this motion on Defendants' behalf.

Dated: April 16, 2020

/s/ Luke N. Berg

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Luke N. Berg